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21 May 2021

Ms. Katrina Higgins-Coltrain
Task Order Monitor
U.S. Environmental Protection Agency (EPA)
1201 Elm Street, Suite 500, SEDRL
Dallas, Texas 75270-2102

RE: Responses to Comments on the Soil Feasibility Study Report, Revision 02
Wilcox Oil Company Superfund Site
Remedial Investigation/Feasibility Study
Remedial Action Contract 2
Contract: EP-W-06-004
Task Order: 0128-RICO-06GG

Dear Ms. Higgins-Coltrain:

EA Engineering, Science, and Technology, Inc., PBC (EA) has prepared the following responses to comments on the Soil Feasibility Study Report, Revision 02. Comments from EPA were received on 18 May 2021.

EPA Comments Received via Email on 18 May 2021

1. *2.7.2 Data Grouping and COPC Identification: It is stated that the California EPA risk-Based Screening levels were used. The EPA human Health regional screening levels (generic) were used. Please remove 'California'.*

EA Response: The text has been revised to state that the EPA Human Health Regional Screening levels were used. The appropriate reference was also included.

2. *Figure 2-6: please revise to include all ROD areas or just use the figure from the Source ROD.*

EA Response: Figure 2-6 has been revised to include all ROD areas.

3. *4.3, last paragraph: volume difference between residential and commercial/industrial is listed as 4,275 while section 4.5.2 lists the difference as 4,646. Please revise to the correct amount. Additionally, this may not be correct depending on the change made related to figures 2-8/2-9 and the volumes reported in 4.5.2.*

EA Response: The volume numbers have been revised according to the changes to Figures 2-8, 2-9, and 2-11. More information about these changes can be seen in Comment #5.



4. 4.5.2: *The table shows one of the industrial/commercial areas to be 110,441 and Figure 2-8 shows this to be 110,416. Please revise to the correct volume, which will also impact the rest of the table values and values listed in the text. OR, this will only cause the figure to be revised.*

EA Response: The volume numbers have been revised according to the changes to Figures 2-8. More information about these changes can be seen in Comment #5.

5. *Figures 2-8 and 2-9*

- *The areas along the RR-tracks appear to show the same sample exceedances, so why are the calculated volumes different?*

EA Response: The exceedances near the railroad tracks in Figure 2-8 and 2-9 have been rechecked. After confirming the exceedances, the shapes and values of those areas were updated in Figures 2-8, 2-9, and 2-11.

- *2-9: there appears to be an X exceeding the PRG but not included within the excavation volume boundary.*

EA Response: Figure 2-9 has been edited to include the exceedance.

- *2-9: change the title from 'industrial areas' to 'residential area'. This figure shows all of wilcox as residential.*

EA Response: The title was not edited to avoid any further confusion. The industrial and residential areas are properly delineated. The use of residential or industrial PRG criteria are also properly referenced. These distinctions help explain the current use of the areas and the reason behind the PRG criteria that were applied.

6. *Figure 2-11*

- *change the title from 'industrial areas' to 'residential area'. This figure shows all of wilcox as residential.*

EA Response: The title was not edited to avoid any further confusion. The industrial and residential areas are properly delineated. The use of residential or industrial PRG criteria are also properly referenced. These distinctions help explain the current use of the areas and the reason behind the PRG criteria that were applied.

- *Revise the text box to match the text in section 4.5.4.*

EA Response: The text box has been revised to appear similar to the one in section 4.5.4.



7. *Table 7-1 is missing.*

EA Response: Table 7-1 had been included.

8. *Cost Summary: Is this Table 7-1?*

- *ICs and 5-yr reviews should not be included for S-2.*

EA Response: Institutional Controls (ICs) and five-year reviews have been removed from Alternative S-2. Table 7-1 has also been attached.

9. *HH PRG Memo: If the memo was updated then it should be dated appropriately and the FS scoping meeting footer should be removed. Please update the memo with the updated date and document revision number*

EA Response: The dates and document revision numbers have been revised in the PRG Memo.

10. *General: be mindful that any alterations of the volumes will require text edits throughout Section 6 and the cost estimates. Edits to cost estimate then affect text in same section.*

EA Response: The volume numbers have been revised and have been changed to reflect the new volumes resulting from changes to Figures 2-8, 2-9, and 2-11. The cost estimate has also been edited to reflect these changes.